

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION

SHANNON KNEECE,

Plaintiff,

V.

SYNEOS HEALTH US, INC. D.B.A SYNEOS  
HEALTH COMMERCIAL SERVICES, LLC,

Defendant.

Case No.: 6:22-cv-02776-TMC-KFM

**DEFENDANT’S MOTION TO COMPEL ARBITRATION OR,  
IN THE ALTERNATIVE, TO DISMISS**

Defendant Syneos Health US, Inc. (“Defendant”), by and through its undersigned counsel, and pursuant to 9 U.S.C. §§ 3-4 and Rule 12(b) of the Federal Rules of Civil Procedure, hereby moves the Court for an order referring the above-referenced matter to arbitration and staying these proceedings pending the outcome of arbitration pursuant to the Federal Arbitration Act, 9 U.S.C. §§ 3-4 or, alternatively, an order dismissing the above-captioned action in its entirety pursuant to the holding of *Choice Hotels Int’l, Inc. v. BSR Tropicana Resort, Inc.*, 252 F.3d 707 (4th Cir. 2001).

Defendant also respectfully requests that the Court impose sanctions against Plaintiff, in the form of Defendant's costs and fees associated with having to bring this Motion. Plaintiff was put on notice that the claims are subject to binding arbitration and refused to refer the matter to arbitration.

For the reasons stated herein and in the Memorandum of Law in Support, filed contemporaneously herewith, Defendant requests that the Court grant its Motion to Compel Arbitration, stay or dismiss Plaintiff's claims, and grant Defendant's request for sanctions.

Respectfully submitted,

OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.

s/Luci L. Nelson

Ashley P. Cuttino  
Fed. I. D. # 9215

Luci L. Nelson  
Fed I.D. # 10341

Attorneys for Defendant Syneos Health  
US, Inc.

The Ogletree Building  
300 North Main Street, Suite 500  
Greenville, SC 29601  
864-271-1300  
864-235-8806  
ashley.cuttino@ogletree.com  
luci.nelson@ogletree.com

**CERTIFICATE OF SERVICE**

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (“NEF”).

John G. Reckenbeil  
Law Office of John Reckenbeil, LLC  
P.O. Box 314  
Mauldin, SC 29662  
john@johnreckenbeillaw.com

s/Luci L. Nelson  
Luci L. Nelson